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May 14, 2025

By ECF

Honorable Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Jonathan Banyan v. P.O. Sikorski, et al.*, 17 Civ. 4942

Your Honor:

I write today on behalf of Plaintiff to respectfully request an extension of the deadline to file a motion for attorney's fees. Per Federal Rule of Civil Procedure 54, the current deadline to file a motion for attorney's fees is May 19th; Plaintiff respectfully requests that it be moved to May 28th.

The motion for attorney's fees requires Plaintiff's counsel to collate hundreds of time entries going back over four years from two different law firms.¹ Furthermore, because Plaintiff succeeded on the excessive force claim against Tennariello alone, Plaintiff's counsel must carefully review each time entry to ensure that it only corresponds to the successful claims. Any time entries relating to multiple claims or defendants must be appropriately reduced or eliminated. The requested extension will enable Plaintiff's counsel to submit the most narrowly-tailored motion possible for the Court's consideration. Finally, the Defendant's counsel consents to this request.

I respectfully thank the Court for its consideration of this request.

Sincerely,

/s/ Joshua Luke Rushing

Luke Rushing

Counsel for Plaintiff Jonathan Banyan

cc: KellyAnne Holohan Esq. via ECF

¹ Plaintiff's lead counsel took this case while an associate at Pryor Cashman LLP but has since transitioned to working at Huth Reynolds LLP. Each firm's records contain hundreds of billing entries related to this matter.